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IN THE UNITED STATES PATENT AND TRADEMARK OFFICE

Appl. No.: 09/998,043 Confirmation No.: 6059
Applicant: Boegelund et al.
Filed: November 29, 2001
TC/A.U. 2626
Examiner: Brian Louis Albertalli
Docket No.: AUS920010680US1
Customer No.: 46129
Title: METHOD FOR TRANSLATING SLIDE PRESENTATIONS INTO
DIFFERENT LANGUAGES

Honorable Commissioner
P. O. Box 1450
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Number EQ 594296739 US

Date of Deposit August 30, 2006

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Darrell Walker
Darrell Walker, Reg. No. 34,945

FEE TRANSMITTAL OF APPELLANT'S BRIEF

Applicant files the attached Appeal Brief in support of the Notice of Appeal filed by Applicant on June 30, 2006 in the above-identified application. Please charge the fee of \$500.00 to Deposit Account No. 09-0447. The due date to file the Appeal Brief in support of appeal is August 30, 2006. Therefore the filing of the brief is considered timely filed.

Respectfully submitted,

Darrell Walker

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August 30, 2006

Appeal Brief
Appl. No.: 09/998,043
Submitted on August 30, 2006



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Darcell Walker, Reg. No. 34,945

**APPELLANT'S BRIEF
IN RESPONSE TO OFFICE ACTION UNDER 37 C.F.R. § 1.192**

This brief is filed in triplicate in support of the previously filed Notice of Appeal, which was filed June 30, 2006, which appealed from the decision of the examiner dated March 31, 2006, rejecting claims 1-30. The fee required under 37 C.F.R. § 1.17(c) for filing a brief in support of an appeal is provided in the Transmittal of Appeal Brief filed herewith.

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1. REAL PARTY IN INTEREST

The real party in interest in this appeal is International Business Machines Corporation (IBM).

2. RELATED APPEALS AND INTERFERENCES

With respect to other appeals or interferences that will directly affect, or be directly affected by, or have a bearing on the Board's decision in the pending appeal, there are no such appeals or interferences.

3. STATUS OF CLAIMS

Claims 1-30 are pending in this application; claims 1-19 are appealed. Claims 20-30 are canceled. No claims have been allowed.

4. STATUS OF AMENDMENTS

Applicant has filed an amendment after final to address objections to the specification.

5. SUMMARY OF THE CLAIMED SUBJECT MATTER

Claim 1 describes a computer-implemented method for translating text on an original slide presentation from a first language to a second language. In this method, an auxiliary text file is created (Fig. 4, step 47, paragraph 0041) that has a format that can enable text to be translated from one language to a second language. Following this text-file creation step, text from an original file is inserted into the created text file (Fig. 4, step 48, paragraph 0041). At this point, the inserted text is translated, in the auxiliary file, from the first language to the second language (Fig. 4, step 49, paragraph 0042). Last, the translated text is written onto an original presentation slide in the same location on the slide of the original text that was translated (Fig. 4, step 50, paragraph 0042).

Claim 15 describes a computer-implemented method for translating text on an original slide presentation from a first language to a second language. In this method, the initial step (Fig. 4, step 46, paragraph 0041) creates a copy of an original presentation slide. Next, an auxiliary text file is created (Fig. 4, step 47, paragraph 0041) that has a format that can enable text to be translated from one language to a second language. Following this text-file creation step, text from an original file is inserted into the created text file (Fig. 4, step 48, paragraph 0041). At this point, the inserted text is translated, in the auxiliary file, from the first language to the second language (Fig. 4, step 49, paragraph 0042). Last, the translated text is written onto an original presentation slide in the same location on the slide of the original text that was translated (Fig. 4, step 50, paragraph 0042).

6. GROUNDS OF REJECTIONS TO BE REVIEWED ON APPEAL

6.A. – Was 35 U.S.C. § 103(a) properly applied against rejected claims 1-6, 10-23 and 27-30 as being unpatentable over Chou (US patent 5,583,761), in view of Applicant's admitted prior art?

ARGUMENTS IN SUPPORT OF SEPARATE PATENTABILITY

Initial review of the teachings of Chou et al.

Chou describes a method that allows application programs, performing user interfacing, to be presented/displayed in part or in whole in any language in real-time as selected by the user. In a preferred embodiment the invention comprises two processes, the Learn process and the Run process. The Learn process constructs an application specific translation table (ASTT) specifically for the target application. The Run process utilizes the ASTT during the execution of the target application and performs actual translation for the displays. Application programs can be a text-based application running in a pure text mode operating system platform. The most commonly used language for the presentation from these application programs is English.

Chou provides a method for translation of application programs such that the display information of the program can be displayed in any language desired by the user. Applicants do admit that Chou provides for the translation of information in a computing environment. However, Chou is a method which users implement as they are interfacing with a computer application program. In this approach, the output is being translated as it is being displayed to a user using the Application Specific Translation Table (ASTT). The Run process executes the target application while the language translation is being performed in parallel (Col. 3, line 5). As mentioned, this process is a real-time application that displays the translated information as it is being generated.

Initial review of Applicants' invention

Applicants' present invention provides a method and system for translating presentation slides from one language to at least one additional language. In this method, text information from one slide can be extracted from a presentation slide. Addressing information contained on the slide is also extracted from the slide. This addressing

information describes the location of the text on the slide. After the text information is extract from the original presentation slide, the text is inserted into an auxiliary file for the translation procedure. This auxiliary file has a format that can be readily translated using current translation techniques. However, the addressing information is transparent and write protected to the translation program and therefore will only pass through without being translated. Following the translation procedure, the addressing information is used to insert the translated text information into a presentation slide containing any objects that existed in the original slide.

Arguments for Patentability

Contrasting Chou with Applicants' present invention

Applicants submit that there are similarities between Chou and the present invention. Both (Chou and Applicants' invention) translate text and use coordinates to identify the location of the string in the text. However, the Applicants' invention is a batch process that performs translations, while Chou is a real-time translation process. Further, Chou does not address the issue of non-text objects in a document. As a result, Chou does not contain steps related to distinguishing text and non-text in a document.

Another distinction is that the Chou method has a Learn process and a Run process that are not contained in Applicants' invention. The inclusion of these processes underscores the difference in the translations of Chou and Applicants' invention. The Learn process discovers from an .exe or .com file translatable text and facilitates semiautomatic translation based on a translation memory/dictionary combined with manual human translation. In the Run process, the user interface for an application (.exe or .com) running under Microsoft Windows operating system is translated on the fly (real time) into the national language of the user's choice the translation performed in the Learn Process.

There is no comparable process in Applicants' present invention to the Run process of Chou. Regarding the Learn process. Considering the Learn process is divided into two processes; (1) Extraction of human readable text requiring translation; and (2) Actual semi-automatic translation of the human readable text. There is no similarity to (2) Actual translation. However, some similarity could be claimed with the Learn

process (1). Extraction of human readable text, however the scenario is quite different from the scenario in Applicants' invention, where the text resides for example in PowerPoint files and is extracted into Word files for translation and then back into the PowerPoint files.

Another distinction in the methods of implementation is that Applicants' invention is first a batch process (see paragraph [0041] of U.S. publication 2003/0101043). In Applicants' present invention, these displays are completed slides that the user desires to translate from the original language in which the slides were created into a different language. This process is not the same parallel creation and translation process described in Chou.

Argument Admission of Prior Art

The examiner also asserts that descriptions in Applicants' specification are admitted prior art. The examiner cited language in paragraph [0003] as admitted prior art. The language in the paragraph [0003] describes tools for the design and creation presentation slides. The description also mentions the display of slides in a presentation format such as a slide show presentation. Further in the discussion paragraph [0012] the Applicants discuss the manual translation of presentation slides from one language to another and the difficulties involved in the manual processes of slide translation. Applicants submit that the general description of tools and techniques for designing and creating slides for presentation are prior art with regard to the techniques of applicants' present invention. To state that techniques exist for design and creation of a presentation does not admit that this particular technique, which is not described, is prior art. Further, the information described in Applicants' specification does not describe the translation of slides from one language to another, nor is this included in any of the Applicants' claims.

The examiner asserts Chou does not disclose the application of Chou is a presentation program for presenting slides. The examiner further implies that the existence of presentation slides and programs for creating these slides in combination with Chou makes Applicants' present invention obvious.

In order to support a prima facie case for obviousness, the cited reference must teach or suggest of each element in a claim. If there is no teaching or suggestion then

there is no prima facie obvious. Chou does not teach or suggest the elements in Applicants' present invention. Chou is a method used to translate text in real time when a file/slide is being created. Applicants' present invention is used to translate (not create) text from a previously existing and completed slide. The dynamics are different because of one slide is being created and the other slide was previously created. Further, Chou incorporates a human interface in the implementation of the Chou method. Applicant's present invention is implemented as an automated batch process.

Applicants submit that contrary to the assertions of the examiner, there is no suggestion or teaching in Chou or the Applicants' specification to modify Chou to produce Applicants' present invention. If there is no teaching, there is no prima facie case for obviousness. Applicants submit that there is no prima facie obviousness in this case.

6.B. – Was 35 U.S.C. § 103(a) properly applied against rejected claims 7-9, and 24-26 as being unpatentable over Chou (US patent 5,583,761), in view of Applicant's admitted prior art and further in view of Rosenbaum (US patent 5,404,435)?

Initial review of Rosenbaum

In Rosenbaum non-text objects are sensed in a mixed object document to be archived in an information retrieval system. In addition to text objects, a mixed object document can contain non-text objects such as image objects, graphics objects, formatted objects, font objects, voice objects, video objects and animation objects. This enables the creation of key words, which characterize the non-text object, for incorporation in the inverted file index of the database, thereby enabling the later retrieval of either the entire document or the independent retrieval of the non-text object through the use of such key words.

Distinction between Rosenbaum and Applicants' invention

Rosenbaum does discuss identifying non-text objects in a file. However, there are two points concerning Rosenbaum, first, Rosenbaum is a document storage program.

This program enables one to identify a particular image in a document independently from the document as a whole. However, Rosenbaum has nothing to do with text translation and is focused identifying and handling non-text objects. Second, contrary to the examiner's assertion, it does not appear that Rosenbaum identifies objects having multiple or sub-objects within an object in a presentation slide. A picture object may contain a text caption. The text caption, which is a separate object in the picture, would need to be translated. Rosenbaum does not address this case.

Arguments for Patentability

In order to support and sustain a prima facie case for obviousness, there must be some teaching or suggestion to combine the references. If there is not teaching or suggestion, there is no prima facie obviousness.

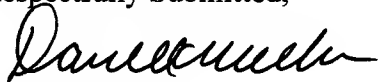
In the present case, Chou (the primary reference) does not address non-text objects. Rosenbaum addresses the identification of non-text objects in the context of document storage and retrieval process. Applicants' present invention does not store and retrieve the non-text objects, but it does identify their location on the presentation slide. Nothing in Chou teaches, mentions or even suggests non-text objects. Nothing in Rosenbaum teaches, suggests or mentions anything about translating documents from one language to a second language. Therefore nothing in the references teaches or suggests the combining of these references to produce the present invention. One reason for the lack of motivation to combine these references is that Chou focuses on translating text (text objects) and Rosenbaum focuses on the storage and retrieval of non-text objects. In fact the title of the Rosenbaum patent is Non-text object storage and retrieval.

7. CONCLUSION

Applicants submit that all of the pending claims are in condition for allowance. Applicants believe that no additional search should be required in view of the type of amendments Applicants made to the claims. Therefore, withdrawal of the rejections and passage to issuance is respectfully requested.

In view of the above arguments, it is respectfully urged that the rejection of the claims should not be sustained.

Respectfully Submitted,



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APPENDIX I - CLAIMS

Claim 1 (Rejected) A computer implemented method for translating text on an original slide presentation from a first language to a second language comprising the steps of:

creating a text file, the text file having a format that can enable text be translated from one language to a second language using conventional file translation techniques;

inserting text from an original presentation slide into the created text file;

translating the text inserted into the text file from a first language to a second language; and

writing the translated text onto the original presentation slide, in the location of the original text that was translated, using information contained in the original presentation slide.

Claim 2 (Rejected) The method as described in claim 1 wherein said addressing information related to the configuration of the objects contained in the original presentation slide is inserted into the created text file, at a location transparent to a user.

Claim 3 (Rejected) The method as described in claim 1 further comprising before said file creation step, the steps of:

obtaining the original presentation slide for which translation is desired;

obtaining the translation language for the presentation slide; and

retrieving the text to be translated from the original presentation slide.

Claim 4 (Rejected) The method as described in claim 3 wherein said text-retrieving step comprises reading the text from the original presentation slide.

Claim 5 (Rejected) The method as described in claim 3 wherein said text-retrieving step comprises copying the text from the original presentation slide.

Claim 6 (Rejected) The method as described in claim 2 wherein the addressing information is extracted from the original presentation slide.

Claim 7 (Rejected) The method as described in claim 3 wherein said text-retrieving step comprises:

- searching the slide presentation for objects;
- determining whether a found object is a text object; and
- exporting the text from the found text object and the found object's addressing information to the created text file.

Claim 8 (Rejected) The method as described in claim 7 further comprising the steps of:

- determining whether the found object is a group;
- searching each sub-object in a determined group for text; exporting the text from each sub-object found in the group; and
- repeating said searching and exporting steps for each sub-object determined to be in the determined group.

Claim 9 (Rejected) The method as described in claim 7 wherein a slide is searched until the lowest level object on that slide is detected.

Claim 10 (Rejected) The method as described in claim 2 wherein said translated presentation slide writing step comprises:

- creating a copy of the original presentation slide; retrieving the translated text information from the new text file;
- retrieving other slide presentation information from the original presentation slide; and
- inserting the translated text information and the other presentation slide information onto the created copy of the original presentation slide such that the inserted information appears in the copy of the original slide in the same configuration as in the original presentation slide.

Claim 11 (Rejected) The method as described in claim 10 wherein said insertion step comprises inserting and positioning said translated text and other original presentation information in the copy of the original presentation slide according to the addressing information for the original slide.

Claim 12 (Rejected) The method as described in claim 1 wherein the addressing information contained in the text file is not translated from the first language to the second language.

Claim 13 (Rejected) The method as described in claim 1 further comprising the steps of:
creating a specific identification for the new translated presentation slide;
attaching a link from the new translated slide to the original presentation slide;
and
storing the translated presentation slide in a translated slide database for the second language.

Claim 14 (Rejected) The method as described in claim 13 further comprising before said new text file creation step, the step of examining links of an original presentation slide to determine if a translated slide for the particular language currently exists and retrieving an existing translated slide.

Claim 15 (Rejected) A computer implemented method for translating text on a presentation slide from a first language to a second language comprising the steps of:

- creating a copy of an original presentation slide from an original presentation slide;

- creating a text file, the text file having a format that can enable text be translated from one language to a second language using conventional file translation techniques;

- inserting text from the copy of an original presentation slide into the created text file;

- translating the text inserted into the text file from a first language to a second language; and

- writing the translated text onto the created copy of the original presentation slide, in the location of the original text that was translated, using information contained in the original presentation slide.

Claim 16 (Rejected) The method as described in claim 15 further comprising before said file creation step, the steps of:

- obtaining the original presentation slide for which translation is desired;

- obtaining the translation language for the presentation slide; and

- retrieving the text to be translated from the original presentation slide.

Claim 17 (Rejected) The method as described in claim 15 wherein said translated presentation slide writing step comprises:

- retrieving the translated text information from the new text file; and

- inserting the translated text information onto the created copy of the original presentation slide such that the inserted information appears in the copy of the original slide in the same configuration as in the original presentation slide.

Claim 18 (Rejected) The method as described in claim 15 further comprising the steps of:
creating a specific identification for the new translated presentation slide;
attaching a link from the new translated slide to the original presentation slide;
and
storing the translated presentation slide in a translated slide database for the second language.

Claim 19 (Rejected) The method as described in claim 18 further comprising before said new text file creation step, the step of examining links of an original presentation slide to determine if a translated slide for the particular language currently exists and retrieving an existing translated slide.

Claim 20 (Canceled)

Claim 21 (Canceled)

Claim 22 (Canceled)

Claim 23 (Canceled)

Claim 24 (Canceled)

Claim 25 (Canceled)

Claim 26 (Canceled)

Claim 27 (Canceled)

Claim 28 (Canceled)

Claim 29 (Canceled)

Claim 30 (Canceled)

EVIDENCE APPENDIX

In accordance with 37 CFR 41.37, submitted herein evidence entered by the examiner and relied upon by appellant in the appeal. The examiner in an office letter dated March 31, 2006 entered the evidence. The evidence includes:

United States Patent Number 5,583,761 – Chou

United States Patent Number 5,404,435 – Rosenbaum

RELATED PROCEEDINGS APPENDIX

There are no related proceedings for this appeal.